



October 5, 2005

Mark B. McClellan, M.D., Ph.D.  
Administrator  
Centers for Medicare & Medicaid Services  
200 Independence Avenue, S.W.  
Room 445-G  
Washington, DC 20201

Dear Dr. McClellan:

As partners in the Hospital Quality Alliance with the Centers for Medicare & Medicaid Services (CMS) and the Agency for Healthcare Research and Quality (AHRQ), we strongly support HCAHPS<sup>®</sup>, the patient experience of care survey. We stand ready to implement HCAHPS as part of our shared goal of making information about hospital quality available to the public on the Hospital Compare Web site.

Research has demonstrated that the information to be collected by HCAHPS is precisely the kind of information consumers value. By including the results of the HCAHPS survey on Hospital Compare, we will greatly enrich consumers' understanding of the ways in which their local hospitals excel. The variety of data available will enable consumers to decide for themselves which aspects of care are most important to them, and use that information to make decisions about their care.

Hospitals and health care practitioners have long known the value of understanding patients' perceptions of care. Nearly three-quarters of hospitals routinely collect such information to improve care in their facilities. Apart from a small number of state efforts, the information is not collected in a uniform manner, and therefore, it is not appropriate to share with the public. HCAHPS will allow hospitals to collect relevant, comparable data that is useful for consumers.

The HCAHPS survey instrument was developed using a scientifically sound process and has undergone substantial scrutiny over the past three years. Most recently, it was reviewed as part of the National Quality Forum's (NQF) consensus development process.

The 27-item questionnaire was overwhelmingly endorsed by the NQF, whose more than 280 voting members are organizations representing consumers, purchasers, providers, and researchers. The NQF-endorsed™ 27-item HCAHPS survey is a national voluntary consensus standard, the only such patient survey to be so designated. The National Technology Transfer and Advancement Act of 1995 directs federal agencies to use industry consensus standards where available. Since CMS and AHRQ are part of the Hospital Quality Alliance, the implementation of anything other than the 27-item HCAHPS survey would require substantive justification.

The Abt study, which your agency commissioned to better understand the cost of implementing HCAHPS, reinforces the high value that consumers will place on HCAHPS. It also reveals that HCAHPS can be implemented by most hospitals at a cost of less than \$1,000, far less than some had estimated.

While cost does not appear to be a deterrent to hospital participation in HCAHPS, the Abt study does raise other implementation issues. For example, the study notes that when hospitals add HCAHPS to their current survey, there may be problems comparing the new results to past trends. This trending is important to hospitals, and we appreciate the willingness of the AHRQ research team to help organizations preserve continuity. The researchers' experience in dealing with similar trending issues on other surveys will be extremely helpful in smoothing the transition to HCAHPS.

The Hospital Quality Alliance is charting future quality measure implementation strategies – both short- and long-term – that will educate and empower consumers. Informed consumers, working with their clinicians, can be a major force in improving health quality and costs, and HCAHPS is crucial to achieving that goal. It is a quantum leap toward consumer-directed health care decision-making.

We appreciate the opportunity to work with you in encouraging the broad adoption of HCAHPS as a standardized hospital quality measure.

Sincerely,

American Hospital Association  
AARP  
AFL-CIO  
American Medical Association  
American Nurses Association  
Association of American Medical Colleges  
Consumer – Purchaser Disclosure Project  
Federation of American Hospitals  
Joint Commission on Accreditation of Healthcare Organizations  
National Quality Forum